

FILED
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

2000 AUG 16 A 8:18

PATRICE G. BURLEY

Plaintiff

*
CLERK'S OFFICE
AT BALTIMORE
*

BY _____ DEPUTY

vs.

* Civil Action No. JFM 00-1280

BALTIMORE CITY'S DEPARTMENT *
OF PUBLIC WORKS -
ENVIRONMENTAL SERVICES *
DIVISION, et al

Defendants

*

CONSENT MOTION FOR TEMPORARY STAY

Patrice G. Burley, Plaintiff, by her undersigned counsel and Defendants Baltimore City Department of Public Works, Environmental Services Division, Ralph O. Coulson, III and William Stack, by their undersigned counsel, pursuant to Local Rule 105.9, do hereby file this Consent Motion for Temporary Stay, and state:

1. Plaintiff originally filed a pro se Complaint alleging employment discrimination against Defendants on or about May 2, 2000. The Defendants responded to Plaintiff's pro se Complaint by filing a Motion to Dismiss on or about June 30, 2000.

2. Plaintiff filed a pro se response to Defendants' Motion to Dismiss on July 14, 2000.

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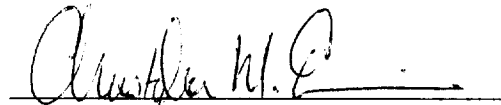
3. Counsel, Christopher M. Erwin, was appointed to represent the Plaintiff on July 26, 2000 and received copies of pleadings in the subject action on or about August 1, 2000.

4. Plaintiff and her recently appointed counsel have not had an opportunity to confer to discuss the merits of Plaintiff's claim and therefore counsel at the present time is unable to prepare any amendments to pleadings and/or serve responsive pleadings to papers filed by the Defendants.

5. Counsel for the Plaintiff contacted and spoke with counsel for the Defendants, Allyson M. Huey, Esquire, who has consented to a temporary stay in the above-captioned action until September 1, 2000 to afford Plaintiff's counsel the opportunity to meet with his client. Defendants' consent is evidenced by the signature of their counsel below.

WHEREFORE, Plaintiff and Defendants jointly request that this Honorable Court enter a temporary stay of proceedings in the above-captioned action until September 1, 2000.


Respectfully submitted,

A handwritten signature in black ink, appearing to read "Christopher M. Erwin", is written over a horizontal line.

Christopher M. Erwin
Fed. Bar No. 11748
Lord & Whip, P.A.
800 One Center Plaza
120 W. Fayette Street
Baltimore, MD 21201
(410) 539-5881
Attorneys for Plaintiff

Allyson M. Huey
Fed. Bar No. 025065
Assistant Solicitor
Baltimore City Office of Law
129 City Hall
100 N. Holliday Street
Baltimore, MD 21202

SO ORDERED:



Honorable J. Frederick Motz, United States
District Court